

REMARKS/ARGUMENTS

The Examiner's Action of July 11 has been received and reviewed by counsel for Assignee. In that Action claims 1-16 were presented for examination, and all claims were rejected. Claim 10 was rejected under 35 U.S.C. § 112, and all claims were rejected under 35 U.S.C. § 102 or 103, in view of U.S. Patent 6,504,571 to *Narayanaswami et al.* Objection was also made to the abstract.

By this response counsel has canceled all pending claims and submits herewith new claims 17-28. These new claims consist of a subset of the former claims, rewritten to place them in better grammatical English, and to emphasize the distinctions between the claims and the '571 reference relied upon by the Examiner.

The cited references are discussed next, followed by a discussion of the distinctions between the claims now pending and those references.

The '571 patent reference involves a digital image archiving method. The images are stored in a database with various parameters, including location, date, time, and the like. When an appropriate query is provided to the database, the selected image data is read out and displayed. As counsel understands the '571 patent, a geographic/map query module 210 (see Figure 2 of '571) generates a map on the computer monitor. The user can then mark specific regions or routes on the map. In response the system searches the image database and retrieves images having parameters corresponding to the marked regions.

As discussed in column 9, lines 14-22, a region-of-interest query can be made which retrieves images from a selected portion of a larger image. For example, a more detailed image of a park might be retrieved from a larger image of an urban area. The query module 210, described in column 9, lines 23-32, generates maps or images in response to regions marked or indicated by the user from a keyboard or mouse.

A photo navigation module 212 (described at column 9, lines 33-45) displays directions according to user input. The directions are described as "places, landmarks, road signs, and stores." (Column 9, lines 37-38.)

In all of these described implementations of the '571 system, no "compound data" in the terms of Applicants' invention is being displayed. What appears to be occurring with the '571 system is that users can query an image database to retrieve images of particular regions, landmarks, etc., but there is no combination of user data from various locations being

performed by the system. The Examiner's citation in support of the claim rejection for this feature of Applicants' invention is to column 9, lines 23-45, of the '571 patent. (See page 4, paragraph 2, of the Action.) As discussed immediately above, however, counsel disagrees with that interpretation of the '571 patent specification. The cited portions referred to by the Examiner do not teach combining user data with map data and stored data, then displaying the combination as claimed herein. They appear to describe on retrieval of information based on user input.

In distinction thereto, in particular, new claim 17 calls for receiving user data from a first terminal, and then combining that user data with map data and stored data, and sending the resulting combination to a second terminal for display. The step of combining the user data with map data and stored data is not taught by the '571 patent.

Each of the other independent claims now presented for examination, notably claims 18, 20, 21 and 22, includes a similar limitation in which compound data, that is data supplied by the user and data retrieved from a database, are combined and displayed on another terminal.

The Examiner has also cited *O'Neil* in support of various obviousness rejections made to the previously-presented claims. Neither *O'Neil* nor any of other references cited by the Examiner teach the aspect of Applicants' invention of combining the user data with the map data and other stored data. Accordingly, considering all of the reference in combination, the aspect of Applicants' invention relating to combining the data is not taught.

For that reason, all of the claims now presented for examination are believed to patentably distinguish the cited references. If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-324-6303 (direct).

Respectfully submitted,



Robert C. Colwell
Reg. No. 27,431

Appln. No.
Amendment dated

PATENT

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 650-326-2400
Fax: 415-576-0300
RCC:mks
60602377 v1